

EXHIBIT "A"

INQ00201
 Name Q SEAWELL ACCOUNT MASTER INQUIRY
 Addr1 DONJA DOB 00000000 2/23/05 08:04:04
 Addr2 4630 WORTH ST SS# 171-58-0986 EDP# 10041740620
 C/S/Z PHILADELPHIA Sps/CM
 Hm Ph 999-999-9999 Wk Ph PA 19124 - 3425 Sp SS# 000000000 Collector 1019
 Emplmt
 Client 10001004 DELL FINANCIAL SERVICES
 Claim Amt 916.58 Lst Trans Dte 6/21/04 Client Acct 940054722170017
 Balance 1,050.97 Follow Up Dte 00000000 Lst Pmt/Clt 5/16/04
 Cmp Bal 1,050.97 N Claim Date 6/22/04 Promise Amount
 Last Pmt .55- 2/22/05 Type 13 Desc 96 96 00 00 00 00 00 00 00 11
 Misc LSE STR: STS: OPND:OTRM:/02 LPS:46.50 Addl Info Y
 Addl Info 9811940054722170017 098
 Memos
 94 LEGAL DEPARTMENT NOTES + 02/23/05 07.51 TWAR 02/17/05 13-08 0.55- +
 00 CLOSING ACCT DUE TO SUIT 02/23/05 07.51 TWAR 02/18/05 13-08 0.55-
 00 COMPLAINT FILED 02/23/05 07.51 TWAR 02/21/05 13-08 0.55-
 00 CLOSED BY UFCXTWARD 6 02/23/05 07.54 DLY7 02/21/05 13-08 0.55-
 00 02/22/05 13-08 0.55-
 04 Hot Call
 CF1-End CF2-Search slct CF3-Summary Inq CF4-Screen 2 CF5/23-All Memos/Pmts
 CF6-Comp Inq CF7-CMB CF8/9-Add'l /Skip CF10-Update CF13/14-Pmts CF15-Base Acct
 CF16-Dup Addr CF17-Trnsf SPNSH CF19-INS CF22-Cos/INS CF24 ST/GL ROLL-Memos

INQ00204

COMPANIONATED MEMO VIEWING

2/23/05 08:07:20

Name . . SEAWELL DONJA
Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0620	50	PB/NCOA REQUESTED	6/22/04	16.35.15	PBOW
		52	Sent for Bankruptcy Info	6/22/04	16.41.34	BKRP
		50	PB Rtrn-Gd Addr/Addr Crct	6/22/04	16.56.11	PBOW
		50	Zip: 19124-342	6/22/04	16.56.11	PBOW
		86	LMTC	6/22/04	17.39.47	SHEN
		52	BANKO Return No Update	6/23/04	7.04.27	BKRP
		91	Ntc Snt-CDG1-Debtr	6/23/04	7.07.32	SYSR
		00	DB SD SHE ONLY WORKS	6/23/04	9.20.34	
		00	PART TIME AND IT IS HARD	6/23/04	9.20.41	
		00	FOR HER TO MAKE A BIG PAY	6/23/04	9.20.48	
		00	MENT AND SHE ALSO HAS	6/23/04	9.21.02	
		00	MANY OTHER BILLS TO PAY	6/23/04	9.21.08	
		00	CAUSE SHE WAS OUT OF WORK	6/23/04	9.21.14	
		00	FOR 8 MONTHS BUT SHE WANT	6/23/04	9.21.21	
		00	TO PAY AND WILL TRY TO SN	6/23/04	9.21.30	

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

INQ00204

COMPANIONATED MEMO VIEWING

2/23/05

P. 19

08:07:20

Name . . SEAWELL

DONJA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0620	00	D A GOOD FAITH PAYMENT	6/23/04	9.21.36	
		00	FOR JUNE AND TRY TO SET U	6/23/04	9.21.43	
		00	P ON SETTLE FOR JULY	6/23/04	9.21.50	
		86	Spoke To DB/No Promise	6/23/04	9.22.53	JBUS
		86	Busy Home PH#	6/23/04	9.02.29	SYSM
		86	Busy Home PH#	6/23/04	9.09.05	SYSM
		86	Busy Home PH#	6/23/04	9.09.17	SYSM
		86	No Answer	6/24/04	9.23.21	DJAM
		00	1017 TO 1001 UFCXFKHAN	6/24/04	11.45.41	*CH*
		06	PHONE HOME-SPOKE WITH CUS	7/01/04	16.46.18	1001
		00	TLK TO DB GV SIF OFFER	7/01/04	16.48.19	1001
		00	AT \$541.59 DB SY SHE CNT	7/01/04	16.48.19	1001
		00	DO THT TLD HER SHE WLL ND	7/01/04	16.48.19	1001
		00	TO SND THE SYSTEM BCK IF	7/01/04	16.48.19	1001
		00	SHE CNT PY FOR IT DB SY	7/01/04	16.48.19	1001 +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

INQ00204

COMPANIONATED MEMO VIEWING

2/23/05

P. 20

08:07:20

Name . . SEAWELL

DONJA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0620	00	SHE WILL TLK TO HER ATTORN	7/01/04	16.48.35	1001
		00	EY AND CLL ME BCK	7/01/04	16.48.35	1001
		01	PHONE HOME-NA	7/06/04	20.34.22	1001
		01	PHONE HOME-NA	7/06/04	20.34.25	1001
		01	PHONE HOME-NA	7/06/04	20.34.27	1001
		01	PHONE HOME-NA	7/06/04	20.34.29	1001
		01	PHONE HOME-NA	7/06/04	20.34.31	1001
		01	PHONE HOME-NA	7/06/04	20.34.32	1001
		90	PTP: 07/31/04 \$00641.60	7/06/04	20.35.15	1001
		02	PHONE HOME-LMTC	7/06/04	20.35.20	1001
		95	CORRESPONDENCE FROM DEBTO	7/15/04	13.20.15	RESH
		00	DBTR STATES NO CALLS ONLY	7/15/04	13.20.26	RESH
		00	WRITTEN COMMUNICATION	7/15/04	13.20.26	RESH
		00	FRWD TO COLL	7/15/04	13.20.29	RESH
		90	Home Phone:215-533-1879	7/15/04	13.20.37	RESH +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

INQ00204

COMPANIONATED MEMO VIEWING

2/23/05 08:07:20

P. 21

Name . . SEAWELL

DONJA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0620	91	Ntc Snt-CDUM-Debtr	7/16/04	3.49.56	SYSR
		00	1001 TO 1013 UFCXJAMES	7/20/04	18.33.03	*CH*
		00	1013 TO 1012 UFCXJAMES	7/20/04	18.40.25	*CH*
		00	1012 TO 1051 UFCXJAMES	7/21/04	10.43.19	MASC
		00	1051 TO 1012 UFCXJAMES	7/21/04	11.23.06	MASC
		01	PHONE HOME-NA	8/07/04	8.34.23	1012
		00	REQ BROKEN PROMISE LTR TO	8/07/04	8.35.03	1012
		00	CUST.	8/07/04	8.35.15	1012
		91	Ntc Snt-CDUO-Debtr	8/08/04	4.18.08	SYSR
		91	Ntc Snt-CDR3-Debtr	8/31/04	4.26.04	SYSR
		00	1012 TO 1013 UFCXJAMES	9/03/04	17.10.52	*CH*
		00	1013 TO 1013 UFCXJAMES	9/03/04	17.10.53	*CH*
		00	1013 TO 1019 UFCXJAMES	9/03/04	17.36.14	*CH*
		00	1019 TO 1038 UFCXJAMES	9/08/04	11.03.28	*CH*
		01	PHONE HOME-NA	9/13/04	16.06.55	1038 +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

INQ00204

COMPANIONATED MEMO VIEWING

2/23/05

P. 22

08:07:20

Name . . SEAWELL

DONJA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0620	91	Ntc Snt-CDAR-Debtr	9/23/04	4.43.41	SYSR
		00	1038 TO 0436 UFCXJAMES	10/01/04	8.37.23	*CH*
		50	PB/NCOA REQUESTED	10/07/04	9.03.30	PBOW
		50	PB Rtrn- No Change	10/07/04	9.21.03	PBOW
		91	Ntc Snt-CDJA-Debtr	10/07/04	10.15.53	SYSR
		00	0436 TO 1019 UFCXJAMES	10/19/04	14.54.22	*CH*
		94	LEGAL DEPARTMENT NOTES	2/23/05	7.51.31	TWAR
		00	CLOSING ACCT DUE TO SUIT	2/23/05	7.51.58	TWAR
		00	COMPLAINT FILED	2/23/05	7.51.58	TWAR
		00	CLOSED BY UFCXTWARD 6	2/23/05	7.54.55	DLY7

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

EXHIBIT "B"

Name O JEFFERSON

LORETTA

DOB 00000000EDP# 10041740333

Addr1

Cell:

Addr2 309 EARL STSS# 425-23-2019

AM/PM

C/S/Z MCCOMBMS 39648- 5041

Sps/CM

Sp SS# 000-00-0000Collector 1019Hm Ph 601-684-6907 Wk Ph

Emplmt

SSI

Ext 2906Client 10001004 DELL FINANCIAL SERVICESReminder Date 0/00/0000 :00Claim Amt 1,471.38Lst Trans Dte 6/21/04Client Acct 940059627590011Balance 1,656.42Follow Up Dte 00000000Lst Pmt/Clnr 11/21/03Cmp Bal 1,656.42N Claim Date 6/22/04

Promise Amount

Last Pmt .81-2/04/05 Type 13 Desc 96 99 96 00 00 00 00 73 00Cls Code 3 Date 2/07/05Misc LSE STR:

STS:

OPND:OTRM:/02 LPS:54.85

Addl Info YAddl Info 9811940059627590011 098

Cosigner/Insured

Memos

Financial Transactions

02 PHONE HOME-LMTC+ 11/17/04 16.22 100101/31/05 13-08 0.81- +02 PHONE HOME-LMTC11/22/04 13.25 100102/01/05 13-08 0.81-00 1001 TO 1019 UFCXCSAVOY01/05/05 08.05 *CH*02/02/05 13-08 0.81-85 CLOSED RECALLED/CANCELLED02/07/05 09.31 SYSM02/03/05 13-08 0.81-0002/04/05 13-08 0.81-06 Good Number

Selective Dunning Form

Mgr Review 6

CF1-End CF2-Search Slct CF3-Summary Inq CF4-Screen 2 CF5/23-All Memos/Pmts

CF6-Comp Inq CF7-CMB CF8/9-Add'l /Skip CF10-Update CF13/14-Pmts CF15-Base Acct

CF16-Dup Addr CF18-Add'l DMGRP CF19-INS CF22-Cos/INS CF24 ST/GL ROLL-Memos

Name . . JEFFERSON

LORETTA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0333	50	PB/NCOA REQUESTED	6/22/04	16.35.16	PBOW
		52	Sent for Bankruptcy Info	6/22/04	16.41.34	BKRP
		50	PB Rtrn-Gd Addr/Addr Crct	6/22/04	16.56.17	PBOW
		50	309 EARL STREET	6/22/04	16.56.17	PBOW
		50	City: MCCOMB,MS	6/22/04	16.56.17	PBOW
		50	Zip: 39648-	6/22/04	16.56.17	PBOW
		00	1013 TO 1037 UFCXFKHAN	6/22/04	18.38.06	*CH*
		52	BANKO Return No Update	6/23/04	7.04.27	BKRP
		91	Ntc Snt-CDG1-Debtr	6/23/04	7.07.33	SYSR
		05	PHONE HOME-DISC	6/23/04	18.20.08	1037
		51	Sent to Telematch/Phone	6/24/04	6.55.13	TMAT
		51	TMATCH Return Phone	6/24/04	10.35.16	TMAT
		00	1037 TO 1039 UFCXFKHAN	6/24/04	11.43.42	*CH*
		90	Home Phone:601-249-0358	6/25/04	8.58.12	
		28	Wrong Number	6/25/04	8.58.16	KLEE +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

Name . . JEFFERSON

LORETTA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0333	28	No Answer 6012490358	6/25/04	8.58.16	SYSM
		01	PHONE HOME-NA	6/28/04	12.36.16	1039
		00	ACCOUNT NEED SKIP	6/28/04	12.38.18	1039
		10	Addr: 1208 WITCERMAN ST	7/12/04	12.29.38	TUSC
		10	Work Phone: 0	7/12/04	12.29.38	TUSC
		10	Emply:	7/12/04	12.29.38	TUSC
		10	TU SCORE: +552	7/12/04	12.29.38	TUSC
		90	Work Phone:601-249-2432	7/13/04	15.21.44	1039
		08	PHONE POE-NA	7/13/04	15.22.01	1039
		00	CLL POE DISCO	7/13/04	15.22.11	1039
		19	MANUAL SKIP TRACE ATTEMPT	7/13/04	20.46.58	1039
		90	Home Phone:	7/13/04	20.47.19	1039
		91	Ntc Snt-CDUM-Debtr	7/16/04	3.49.56	SYSR
		90	Home Phone:601-249-2432	7/19/04	20.37.39	
		28	Wrong Number	7/19/04	20.37.40	KLEE +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

Name . . JEFFERSON

LORETTA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0333	28	No Answer 6012492432	7/19/04	20.37.41	SYSM
		00	1039 TO 1013 UFCXJAMES	7/20/04	18.34.38	*CH*
		00	1013 TO 1037 UFCXJAMES	7/20/04	18.40.25	*CH*
		05	PHONE HOME-DISC	7/23/04	14.36.44	1037
		44	SEND TO MANAGER FOR REVIE	7/27/04	13.43.42	1039
		19	MANUAL SKIP TRACE ATTEMPT	7/27/04	13.43.58	1039
		01	PHONE HOME-NA	7/27/04	13.44.17	1039
		90	Home Phone:	7/27/04	13.45.42	1039
		90	Work Phone:	7/27/04	13.45.42	1039
		28	No Answer	7/31/04	10.33.14	SOYE
		28	No Answer Home PH#	7/31/04	10.33.14	SYSM
		86	LMTC	8/02/04	17.26.42	RWOO
		90	Work Phone:601-249-0358	8/03/04	18.47.18	1027
		91	Ntc Snt-CDUO-Debtr	8/08/04	4.18.09	SYSR
		86	No Answer Home PH#	8/23/04	12.06.11	SYSM +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

Name . . JEFFERSON
 Highlight Memo Type . . 00

LORETTA

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0333	86	No Answer Home PH#	8/23/04	14.58.51	SYSM
		86	No Answer Home PH#	8/24/04	17.26.17	SYSM
		86	No Answer Home PH#	8/24/04	20.12.07	SYSM
		86	No Answer Home PH#	8/27/04	8.10.58	SYSM
		86	No Answer Home PH#	8/27/04	8.39.07	SYSM
		86	No Answer Home PH#	8/27/04	14.24.00	SYSM
		86	No Answer Home PH#	8/28/04	9.10.55	SYSM
		91	Ntc Snt-CDR3-Debtr	8/31/04	4.26.05	SYSR
		00	1037 TO 1013 UFCXJAMES	9/03/04	17.11.50	*CH*
		00	1013 TO 1019 UFCXJAMES	9/03/04	17.36.14	*CH*
		86	No Answer Home PH#	9/03/04	9.06.39	SYSM
		86	No Answer Home PH#	9/03/04	10.51.00	SYSM
		00	1019 TO 1039 UFCXJAMES	9/08/04	11.03.27	*CH*
		86	No Answer Home PH#	9/09/04	10.53.12	SYSM
		86	No Answer Home PH#	9/10/04	10.47.05	SYSM +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

Name . . JEFFERSON

LORETTA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0333	86	No Answer Home PH#	9/10/04	11.43.50	SYSM
		86	No Answer Home PH#	9/16/04	11.16.16	SYSM
		86	No Answer Home PH#	9/16/04	13.26.24	SYSM
		86	No Answer Home PH#	9/20/04	12.43.42	SYSM
		86	No Answer Home PH#	9/20/04	13.01.18	SYSM
		91	Ntc Snt-CDAR-Debtr	9/23/04	4.43.42	SYSR
		01	PHONE HOME-NA	9/28/04	18.19.09	1039
		00	1039 TO 1019 UFCXJAMES	10/04/04	20.18.45	*CH*
		50	PB/NCOA REQUESTED	10/07/04	9.03.29	PBOW
		50	PB Rtrn- No Change	10/07/04	9.21.00	PBOW
		91	Ntc Snt-CDJA-Debtr	10/07/04	10.16.10	SYSR
		00	1019 TO 1001 UFCXJAMES	10/11/04	14.43.38	*CH*
		91	Ntc Snt-CDCB-Debtr	10/15/04	4.58.01	OPMA
		28	No Answer	10/14/04	8.47.02	MARY
		28	No Answer Home PH#	10/14/04	8.47.02	SYSM +

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

Name . . JEFFERSON

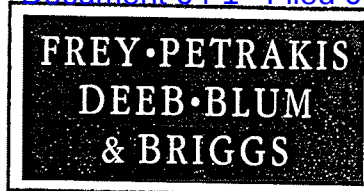
LORETTA

Highlight Memo Type . . 00

Base	EDP Number	Type	Memo Text	Date	Time	Collector
*	10-04-174-0333	29	No Answer Home PH#	10/21/04	11.17.38	SYSM
		29	No Answer Home PH#	10/21/04	9.17.23	SYSM
		29	No Answer Home PH#	10/28/04	9.37.32	SYSM
		29	No Answer Home PH#	10/28/04	11.15.30	SYSM
		29	No Answer Home PH#	11/03/04	9.06.56	SYSM
		29	Busy Home PH#	11/09/04	15.36.09	SYSM
		29	No Answer Home PH#	11/09/04	13.37.59	SYSM
		29	No Answer Home PH#	11/15/04	15.07.07	SYSM
		02	PHONE HOME-LMTC	11/17/04	16.22.40	1001
		02	PHONE HOME-LMTC	11/22/04	13.25.51	1001
		00	1001 TO 1019 UFCXCSAVOY	1/05/05	8.05.11	*CH*
		85	CLOSED RECALLED/CANCELLED	2/07/05	9.31.17	SYSM

CF1-End CF4-Acct Scrn CF6-Comp Inq CF7-Help CF23-Payments

EXHIBIT "C"



ATTORNEYS AT LAW

December 8, 2006

VIA HAND DELIVERY

James A. Francis, Esquire
Francis & Mailman
100 South Broad Street
19th Floor
Philadelphia, PA 19110

Reply To:

PHILADELPHIA

1601 Market Street
Suite 2600
Philadelphia, PA 19103

(215) 563-0500
Fax: (215) 563-5532

10 Melrose Avenue
Suite 430
Cherry Hill, NJ 08003
(856) 216-2322
Fax: (856) 216-2392

15 North Shore Road
Marmora, NJ 08223
(609) 390-0127
Fax: (609) 390-0244

www.fpdb.com

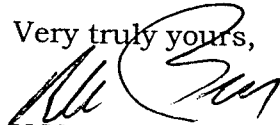
RE: Donja Seawell, et al vs. Universal Fidelity Corporation
CIVIL ACTION NO. 05-0479

Dear Mr. Francis:

Enclosed please find documents that the Defendant reserves the right to introduce at the time of trial. These documents are the credit history documents for each of the class members. Although none of your previous discovery requests directly address the documents, Defendant produces these documents in the spirit of Rule 26.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



NORMAN W. BRIGGS

NWB/krt
Enclosure

EXHIBIT "D"

LAW OFFICES

FRANCIS & MAILMAN

A PROFESSIONAL CORPORATION

LAND TITLE BUILDING, 19TH FLOOR

100 SOUTH BROAD STREET

PHILADELPHIA, PA 19110

215-735-8600

FAX: 215-940-8000

WWW.CONSUMERLAWFIRM.COM

EMAIL: INFO@CONSUMERLAWFIRM.COM

December 13, 2006

Via Facsimile

Norman W. Briggs, Esquire
Frey, Petrakis, Deeb, Blum,
Briggs & Mitts, PC.
1601 Market Street
Suite 2600
Philadelphia, PA 19103

Re: Seawell v. Universal Fidelity Corporation, No. 05-479

Dear Mr. Briggs:

This is in response to your letter to Jim Francis dated December 8, 2006 and your document production of the same date. In a matter where you have previously represented the Defendant could not identify class members, we are shocked with the thousands of pages of documents that you produced on Friday allegedly relating to the credit history of class members, and including detailed information about them and their account history. Contrary to what you say in your letter of the 8th, we do not find the production to be either in the spirit or to the letter of Rule 26. It goes without saying that we reserve the rights to object to the introduction of any of these documents at trial.

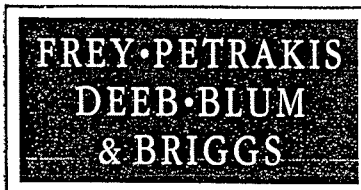
If you have any questions, please do not hesitate to contact me.

Very truly yours,


JOHN SOUMIAS

JS/lap

EXHIBIT "E"



ATTORNEYS AT LAW

December 15, 2006

VIA TELECOPIER AND ORDINARY MAIL

Reply To:

John Soumilas, Esquire
Francis & Mailman
100 South Broad Street
19th Floor
Philadelphia, PA 19110

PHILADELPHIA
1601 Market Street

Suite 2600

Philadelphia, PA 19103

(215) 563-0500

Fax: (215) 563-5532

RE: Donja Seawell, et al vs. Universal Fidelity Corporation
CIVIL ACTION NO. 05-0479

Dear Mr. Soumilas:

This letter is in response to your correspondence of December 13, 2006. Unfortunately, your letter completely misrepresents the procedural history and discovery in this case.

The class action comprises 321 individuals who received the same letter and letterhead as you client did bearing the date of September 23, 2004. These class members were identified pursuant to the class certification depositions that were conducted on November 9, 2006. After those depositions, you requested the Court to certify that the "class" be the 321 individuals who received a similar letter with a date of September 23, 2006 and a similar letterhead that your client received.

Similar to the credit history for the named Plaintiff, Donja Seawell, which was produced in August 2005, the document production of December 8, 2006 merely represents the credit history for the 321 class members identified. Please advise the specific document request or interrogatory that Plaintiff previously propounded that ever asked for the credit history of any of these class members. More importantly, please identify how the production of these credit history document at this time some how prejudice your client's alleged claim or case in chief.

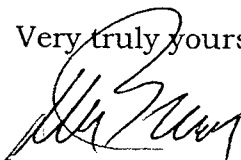
10 Melrose Avenue
Suite 430
Cherry Hill, NJ 08003
(856) 216-2322
Fax: (856) 216-2392

15 North Shore Road
Marmora, NJ 08223
(609) 390-0127
Fax: (609) 390-0244

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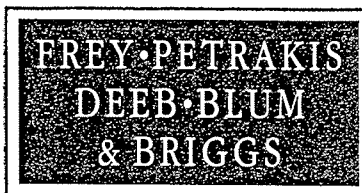
John Soumilas, Esquire
December 15, 2006
Page 2

If you wish to discuss that further, please do not hesitate to
contact me.

Very truly yours,

NORMAN W. BRIGGS

NWB/krt

EXHIBIT "F"



ATTORNEYS AT LAW

May 30, 2007

John Soumilas, Esquire
Francis & Mailman
100 South Broad Street
19th Floor
Philadelphia, PA 19110

Reply To:

PHILADELPHIA

RE: Donja Seawell, et al vs. Universal Fidelity Corporation
CIVIL ACTION NO. 05-0479

1601 Market Street

Suite 2600

Philadelphia, PA 19103

(215) 563-0500

Fax: (215) 563-5532

10 Melrose Avenue

Suite 430

Cherry Hill, NJ 08003

(856) 216-2322

Fax: (856) 216-2392

15 North Shore Road

Marmora, NJ 08223

(609) 390-0127

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Dear Mr. Soumilas:

As you know a Pre-Trial Conference was scheduled for today, May 30, 2007 at 10:00 AM. I enclose a copy of the Notice that we received from the Court, which identifies the date and the time. We will await a new date for the Pre-Trial Conference.

The case will be listed for trial at some point in the next few months. Nevertheless, Defendant Universal Fidelity Corporation wants to specify its objections to various witnesses and exhibits listed in your Pre-Trial Memorandum pursuant to Rule 26(a)(3).

Your Pre-Trial Memorandum identifies certain corporate representatives of NCO Financial Systems, Inc., Arrow Financial Services, LLC and Academy Collection Services, Inc. (witnesses 10 through 12 on your Pre-Trial Memorandum). Apparently, these individuals will authenticate certain sample debt collection letters from these other debt collection services. (Exhibits P11 through P16) Defendant objects to these witnesses, and more particularly, the sample debt collection letters because of relevance. The issue is this case is whether the letterhead utilized by my client was misleading or deceptive. Sample debt collection letters used by other third party debt collectors has no bearing on that issue.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

NORMAN W. BRIGGS

NWB/krt
Enclosure

cc: James Francis